

United States District Court  
Southern District of New York

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Federal Question and US Civil Statute violated is 320: Assault, Libel and Slander.

CoA Code: 28:1331as  
Jury Trial Demanded.

## COMPLAINT IN CIVIL COURT

### Jurisdiction

Jurisdiction because of Defendant work and home. Manhattan in New York County. General civil jurisdiction.

### Parties

Plaintiff: Eugenia Song of Dallas Ft Worth, Texas.

Defendant: Peter Coleman of Westchester County, New York. Work address is Teachers College, Columbia University, 525 West 120th Street, New York, NY 10027

### Claims

1. On or around December 15, 2022, the defendant made a false and defamatory statement concerning the plaintiff, which resulted in rejection of application for the Master in Divinity degree from Yale University's Divinity School. The statement was made by phone call to Antonio Bravo, the Assistant Director of Admissions and Recruitment, Assistant Director of International Student Exchange Programs whose phone number is (203) 432-2030.
2. The defendant made the defamatory statement to a third party knowing it was false (or they should have known it was false). The communication was defamatory because "if it tends so to harm the reputation of another as to lower him in the estimation of the community or to deter third persons from associating with him," as based on the American Restatement of Torts.
3. The defendant made the defamatory statement disseminated through a publication or communication via e-mail and telephone and the plaintiff's reputation suffered damage or harm. The plaintiff is a graduate of the Yale School of Management, and was certainly denied admission solely because of this man's libel.

4. The defendant's libel and slander impair the plaintiff's financial well-being and future.
5. Plaintiff is asserting proximate and direct cause from actions of defendant.

Relief Sought

Plaintiff prays that the court request that the Defendant stop calling people and talking about her immediately, as well \$1.00 in damages.

Certify verification with Notary

Signature: 

Name: Eugenia Song

Date: 5/29/23

Contact: 503-575-5298

eugenia.song@icloud.com

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